



FILED

9-23-16
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HSY/vm1 9/23/2016

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Starline Tours of Hollywood, Inc.,

Complainant,

vs.

EHM Productions, Inc., dba TMZ,
TMZ.Com, TMZ Celebrity Tour,

Defendant.

Case 16-06-007
(Filed June 7, 2016)

**E-MAIL RULING RESETTING HEARING AND SERVICE OF TESTIMONY
DATES**

Dated September 23, 2016, at San Francisco, California.

/s/ HALLIE YACKNIN

Hallie Yacknin
Administrative Law Judge

From: Yacknin, Hallie

Sent: Friday, September 23, 2016 11:39 AM

To: 'SHong'; Mohammed Ghods

Cc: TMacBride; Thomas, Sarah R.; Ruth Lopez; Wong, Lester; Sandra Vivonia; 'Linda M. Burrow'; Albert Giang; ALJ Docket Office; ALJ_Support ID; ALJ Process

Subject: C.16-06-007, Starline Tours v. EHM et al. -- EMAIL RULING RESETTING HEARING AND SERVICE OF TESTIMONY DATES

Parties:

The evidentiary hearing in this matter is reset to December 6, 2016.

The time for serving direct testimony is extended to October 11, and the time for serving rebuttal testimony is extended to November 8.

Docket Office shall formally file this email ruling.

ALJ Hallie Yacknin

From: SHong [<mailto:SHong@goodinmacbride.com>]

Sent: Thursday, September 22, 2016 1:25 PM

To: Yacknin, Hallie; Mohammed Ghods

Cc: TMacBride; Thomas, Sarah R.; Ruth Lopez; Wong, Lester; Sandra Vivonia; 'Linda M. Burrow'; Albert Giang

Subject: RE: C.16-06-007, Starline Tours v. EHM et al. -- Starline request for 60-day continuance

I apologize for any confusion, all defendants, including EHM and MBLC, are available on 12/1. Thank you.

Suzy Hong

tel 415.392.7900 | fax 415.398.4321

505 Sansome Street, Suite 900 | San Francisco, CA 94111

shong@goodinmacbride.com

vCard | www.goodinmacbride.com

GOODIN,
MACBRIDE,
SQUERI & DAY, LLP

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From: Yacknin, Hallie [<mailto:hallie.yacknin@cpuc.ca.gov>]

Sent: Thursday, September 22, 2016 1:18 PM

To: SHong; Mohammed Ghods

Cc: TMacBride; Thomas, Sarah R.; Ruth Lopez; Wong, Lester; Sandra Vivonia; 'Linda M. Burrow'; Albert

Giang

Subject: RE: C.16-06-007, Starline Tours v. EHM et al. -- Starline request for 60-day continuance

Ms. Hong –

I am a little confused by your last statement, as I had been assuming – perhaps erroneously – that you had been representing all of the defendants' availability with respect to 11/29 and 12/1, and not just TMZ's (who I thought was EHM's dba...) Please clarify. If you do not speak for EHM and MBLC, would Ms. Burrow and Mr. Giang – who have been cc'd on this email string from the start – please weigh in as to availability on those date.

Once I determine the date, I will address the timing for prepared testimony, taking into account your concerns.

Hallie Yacknin
Administrative Law Judge
415.703.1675

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From: SHong [<mailto:SHong@goodinmacbride.com>]

Sent: Thursday, September 22, 2016 1:09 PM

To: Yacknin, Hallie; Mohammed Ghods

Cc: TMacBride; Thomas, Sarah R.; Ruth Lopez; Wong, Lester; Sandra Vivonia; 'Linda M. Burrow'; Albert Giang

Subject: RE: C.16-06-007, Starline Tours v. EHM et al. -- Starline request for 60-day continuance

Your Honor, TMZ is available on 12/1. However, as stated in my email earlier this morning, we respectfully request that Starline's proposal for a further extension of the schedule to submit testimony be denied, as that would leave TMZ very little time to prepare for the hearing due to the Thanksgiving holiday.

In addition, I would just like to note that Linda Burrow and Albert Giang of Caldwell Leslie & Proctor have been added to the Service List for this proceeding and are also representing defendants, EHM and MBLC.

Thank you.

Suzy Hong

tel 415.392.7900 | fax 415.398.4321

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From: Yacknin, Hallie [<mailto:hallie.yacknin@cpuc.ca.gov>]

Sent: Thursday, September 22, 2016 10:18 AM

To: SHong; Mohammed Ghods

Cc: TMacBride; Thomas, Sarah R.; Ruth Lopez; Wong, Lester; Sandra Vivonia; 'Linda M. Burrow'; Albert Giang

Subject: RE: C.16-06-007, Starline Tours v. EHM et al. -- Starline request for 60-day continuance

What is the parties' availability on Nov. 30 and/or Dec. 1?

Hallie Yacknin
Administrative Law Judge
415.703.1675

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From: SHong [<mailto:SHong@goodinmacbride.com>]

Sent: Thursday, September 22, 2016 10:14 AM

To: Yacknin, Hallie; Mohammed Ghods

Cc: TMacBride; Thomas, Sarah R.; Ruth Lopez; Wong, Lester; Sandra Vivonia; 'Linda M. Burrow'; Albert Giang

Subject: RE: C.16-06-007, Starline Tours v. EHM et al. -- Starline request for 60-day continuance

Good morning Your Honor,

Unfortunately, we have conflicts on November 29, so will need to stick with December 6.

We, however, oppose Starline's proposed amendment to the schedule for submitting testimony. The schedule proposed by Starline's counsel gives Starline more than five months since it filed its original complaint and more than two months since it filed its amended complaint to submit its direct testimony, while giving EHM and MBLC only four weeks to respond. We therefore respectfully request that the existing deadlines only be extended by 14 days each, as set forth in our September 21 email and as agreed to by Starline in its email of September 19. In the alternative, if the dates are to be extended further, we request that such extension result in additional time for EHM and MBLC to respond to Starline's prepared direct testimony.

Thank you.

Best regards,
Suzy Hong

Suzy Hong

tel 415.392.7900 | fax 415.398.4321
505 Sansome Street, Suite 900 | San Francisco, CA 94111
shong@goodinmacbride.com
vCard | www.goodinmacbride.com

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From: Yacknin, Hallie [<mailto:hallie.yacknin@cpuc.ca.gov>]
Sent: Thursday, September 22, 2016 8:46 AM
To: Mohammed Ghods; SHong
Cc: TMacBride; Thomas, Sarah R.; Ruth Lopez; Wong, Lester; Sandra Vivonia; 'Linda M. Burrow'; Albert Giang
Subject: RE: C.16-06-007, Starline Tours v. EHM et al. -- Starline request for 60-day continuance

Before we get to that, the Calendar Clerk now informs me that November 29 is available. Please advise me as to the parties' availability on that date.

Hallie Yacknin
Administrative Law Judge
415.703.1675

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From: Mohammed Ghods [<mailto:mghods@lexopusfirm.com>]

Sent: Thursday, September 22, 2016 8:35 AM

To: SHong; Yacknin, Hallie

Cc: TMacBride; Thomas, Sarah R.; Ruth Lopez; Wong, Lester; Sandra Vivonia; 'Linda M. Burrow'; Albert Giang

Subject: Re: C.16-06-007, Starline Tours v. EHM et al. -- Starline request for 60-day continuance

Judge Yacknin, since the hearing will be on 12/6, we request Your Honor allow a bit more time for the parties papers. Keeping the same pace, I propose October 24th for Starline's direct testimony and November 22nd for TMZ's. In any event, we appreciate the extension and will abide by any schedule Your Honor sets that is workable for you and TMZ.

Thank you.

**** Please note our firm name has changed****

Mohammed K. Ghods

LEX OPUS APC

3070 Bristol Street, Suite 530

Costa Mesa, CA 92626

Telephone: [\(949\) 825-6140](tel:(949)825-6140)

Facsimile: [\(949\)825-6141](tel:(949)825-6141)

Website: www.lexopusfirm.com

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From: SHong <SHong@goodinmacbride.com>

Sent: Wednesday, September 21, 2016 4:40:37 PM

To: 'Yacknin, Hallie'; Mohammed Ghods

Cc: TMacBride; Thomas, Sarah R.; Ruth Lopez; Wong, Lester; Sandra Vivonia; 'Linda M. Burrow'; Albert Giang

Subject: RE: C.16-06-007, Starline Tours v. EHM et al. -- Starline request for 60-day continuance

Good afternoon Your Honor, my apologies for the delay in getting back to you, the 12/6 hearing date works for TMZ as well.

And just by way of confirmation, based on the 14-day continuance, Starline's prepared direct testimony will be due on October 11th and TMZ's prepared rebuttal testimony on November 8th, is that correct?

Thank you very much.

Best regards,
Suzy Hong

Suzy Hong

tel 415.392.7900 | fax 415.398.4321

505 Sansome Street, Suite 900 | San Francisco, CA 94111

shong@goodinmacbride.com

vCard | www.goodinmacbride.com

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From: Yacknin, Hallie [<mailto:hallie.yacknin@cpuc.ca.gov>]
Sent: Wednesday, September 21, 2016 10:52 AM
To: Mohammed Ghods
Cc: TMacBride; SHong; Thomas, Sarah R.; Ruth Lopez; Wong, Lester; Sandra Vivonia
Subject: RE: C.16-06-007, Starline Tours v. EHM et al. -- Starline request for 60-day continuance
Importance: High

Mr. McBride and Mr. Ghods –

The 2-week delay lands us on 11/22, which is the Tuesday before Thanksgiving, and I prefer not to travel during that peak time if it can be avoided.

The following week is not available on the CPUC calendar. However, Tuesday, 12/6 is available as am I. Please advise me asap of your availability on that date.

Hallie Yacknin
Administrative Law Judge
415.703.1675

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From: Mohammed Ghods [<mailto:mghods@lexopusfirm.com>]
Sent: Monday, September 19, 2016 12:33 PM
To: Yacknin, Hallie
Cc: TMacBride@GoodinMacBride.com; shong@goodinmacbride.com; Thomas, Sarah R.; Ruth Lopez; Wong, Lester; Sandra Vivonia
Subject: Re: C.16-06-007, Starline Tours v. EHM et al. -- Starline request for 60-day continuance

Thank you Judge Yacknin.

In light of your ruling, we request a 14 day continuance and will try to get the work done in that time frame.

Thank you for considering this request.

Mohammed K. Ghods

Sent from my iPhone with apologies & ror for errors

On Sep 19, 2016, at 2:50 PM, Yacknin, Hallie <hallie.yacknin@cpuc.ca.gov> wrote:

Mr. Ghods:

I deny your request for a 60 day continuance. The CPUC is under statutory requirement to expeditiously process this matter and such extension would jeopardize our ability to do so. Furthermore, the schedule was set with your concurrence and with your expectation that you would seek to add MBLC as a defendant; in any event, that addition does not materially expand the very limited scope of factual issues to be addressed in evidence.

Please let me know if you request a 14 day continuance, which I am willing to grant in order to accommodate your responsibilities with respect to your November 3 trial. (I note that Mr. McBride indicates that your November 3 trial date was set with your agreement after our prehearing conference at which we discussed the schedule for this matter. Please advise me if Mr. McBride is incorrect in this matter.)

Alternatively, I will allow you to withdraw your complaint in advance of the recently noticed depositions that I see you have set for September 22 and 23.

Hallie Yacknin
Administrative Law Judge
415.703.1675

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From: Ruth Lopez [<mailto:rlopez@lexopusfirm.com>]
Sent: Thursday, September 15, 2016 5:08 PM
To: Yacknin, Hallie; Thomas, Sarah R.; TMacBride@GoodinMacBride.com; shong@goodinmacbride.com
Cc: Mohammed Ghods; Sandra Vivonia
Subject: Starline Tours of Hollywood, Inc. v. EHM Productions, et al.

Dear Honorable Judge Yacknin:

Please see attached.

Thank you.

Ruth E. Lopez
LEX OPUS APC
3070 Bristol Street, Suite 530
Costa Mesa, CA 92626
Telephone:(949) 825-6140
Facsimile: (949)825-6141

Website: www.lexopusfirm.com

<image001.png>

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